

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICIA RODRIGUEZ,	)	
	)	
Plaintiff,	)	
	)	<b>No. 08 C 2095</b>
v.	)	
	)	
CITY OF CHICAGO and Chicago Police Officers	)	JUDGE LEINENWEBER
M. MALDONADO, Star #19179, N. BARRY,	)	
Star #3696, C. TRAYNOR, Star #8903,	)	
UNKNOWN CHICAGO POLICE OFFICERS,	)	
G-A RESTAURANT, LLC (d/b/a "Manor/Stay"),	)	Magistrate Judge Nolan
COLIN COMER, and UNKNOWN G-A	)	
RESTAURANT EMPLOYEES,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF CHICAGO'S AGREED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully moves for an extension of time to August 1, 2008 to answer or otherwise plead in response to Plaintiff's complaint. In support of this motion, the City states the following:

1. Plaintiff filed her complaint on or about April 14, 2008. The City was served with Plaintiff's complaint on or about May 5, 2008, thereby making the City's answer to Plaintiff's complaint due on or about May 25, 2008.
2. Undersigned counsel for the City was assigned to this case in June of 2008, the first opportunity that undersigned counsel had to review Plaintiff's complaint.
3. Undersigned counsel is in the process of reviewing Plaintiff's complaint and gathering documents responsive to the complaint.

4. This motion is the City's first request for an extension of time to answer or otherwise plead. This request is made not to delay the proceedings but rather to allow the City to respond properly to the allegations in Plaintiff's complaint.

5. Undersigned counsel spoke with one of Plaintiff's attorneys, Jared Kosoglad of the Law Office of Christopher R. Smith, by telephone on June 25, 2008. Mr. Kosoglad said that he has no objection to the City's request for an extension of time to answer or otherwise plead.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time to August 1, 2008 to answer or otherwise plead in response to Plaintiff's complaint; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel  
City of Chicago

BY: /s/ Thomas J. Aumann  
THOMAS J. AUMANN  
Assistant Corporation Counsel

City of Chicago, Department of Law  
30 North LaSalle Street  
Suite 1020  
Chicago, Illinois 60602  
(312) 744-1566 (Phone)  
(312) 744-3989 (Fax)  
Atty. No. 06282455

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing **Notice of Motion** and **Defendant City of Chicago's Agreed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint** to be served upon Jared Kosoglad at [jared.k@chicagocivilrightslawyers.com](mailto:jared.k@chicagocivilrightslawyers.com) and Thomas Freitag at [thomas.freitag@cityofchicago.org](mailto:thomas.freitag@cityofchicago.org), via electronic mail, on this 1st day of July, 2008.

/s/ Thomas J. Aumann  
THOMAS J. AUMANN  
Assistant Corporation Counsel